



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00296.003154
MOFFETT FIELD
SSIC NO. 5090.3.A.

July 30, 1998

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 210
San Bruno, CA. 94066-2402

Re: Response to Comments on *Draft Final OUI Postclosure and Closure Monitoring Plan*,
dated June 29, 1998

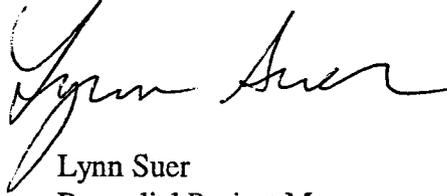
Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject response to comments. The document addressed two previous comments. The responses are satisfactory and we hereby concur with them. Contingent upon the incorporation of these responses, we also concur with the final version of the document. There was, however, concern regarding the comment #1 (old comment #3) on the use of surrogate monitoring in place of metals. While EPA agrees in concept with the use of surrogates, certain conditions need to be met:

1. We believe there should be minimal risk in losing a round of sampling data if the use of surrogates proves unreliable;
2. The Navy must agree that if the use of surrogates proves unreliable, that direct measurement of metals will be performed;
3. The Navy must provide a more detailed explanation, including criteria in terms of pH, TOC, and total nitrogen, that will cause a decision to be taken (a flow chart with numerical decision points);
4. The Navy should provide the quoted reference papers; and
5. The Navy must provide the next round of sampling data, including the eight monitoring wells for total metals, showing rationale for the reliability of the use of surrogates. If the reliability of the use of surrogates cannot be definitively shown using the next sampling round, it is recommended that the metals be directly measured along with the surrogates until a reliable measure of agreement and the factors that may affect the agreement are determined.

Comments are from our Quality Assurance Program. If you have any questions, please call me at 415-744-2396.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Suer". The signature is fluid and cursive, with the first name "Lynn" written in a larger, more prominent script than the last name "Suer".

Lynn Suer
Remedial Project Manager
Federal Facilities Cleanup Branch

cc: J. Chou (RWQCB)
K. Eichstaedt (email)
T. Mower (PRC) (email)
S. Olliges (NASA) (email)
P. Strauss (PM Strauss and Associates) (email)